

REMARKS

Entry of this Amendment, and reconsideration and withdrawal of all grounds of rejection are respectfully requested in light of the above amendments and the following remarks. Claims 1-10, as shown above, remain pending herein.

Claims 1-2, 7 and 10 stand rejected under 35 U.S.C. §103(a) over Snell (U.S. 6,152,435). Applicants respectfully traverse this ground of rejection.

Applicants have amended base claim 1 to clarify that the guide member and its relation to the cassette by reciting that the guide member includes at least two guides with:

each guide having a respective end portion protruding to secure a cassette adapted for holding one or more substrates, said cassette includes a plurality of recessed portions adapted to receive the respective protruding end portion of each guide, wherein said cassette is arranged between the guides to receive the protruding end portion of at least two guides at opposite ends of the cassette in respective recessed portions of the cassette, so that the cassette is aligned and identically situated with respect to the base plate upon introduction to the holder, wherein the respective end portion of each guide having a first side of the guide member which is facing away from the base plate and a second side of the guide member facing toward the base plate and being tapered so as to form the respective protruding end portion, the recessed portions of the cassette having a corresponding tapered recess to receive at least a portion of the guide situated closest to the cassette arranged at a predetermined distance from the cassette so as to accurately hold the cassette in alignment on the base plate within the predetermined distance of the guides from the cassette.

Applicants respectfully submit that Snell fails to disclose or suggest a holder having the arrangement of the base plate, guide member, and cassette as arranged and

recited above so as to hold the cassette in alignment on the base plate within a very small predetermined distance (specification says typically about 1mm).

Snell, which is a multi-diameter vise that holds different diameter pipes by arranging one or more collet pads within an inside surface of the collet jaw, fails to disclose or suggest the structure and the arrangement there between of the instantly claimed invention recited in claim 1. Thus, a person of ordinary skill in the art would not have found any of the instant claims to be obvious in view of the reference.

Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 1-2, 4 and 7-9 stand rejected under 35 U.S.C. §103 over Engibarov (U.S. 5,060,920). Applicants respectfully traverse this ground of rejection in part for some of the same reasons indicated above in the previous rejection of these claims.

For example, Engibarov discloses a quick change jaw assembly for a high precision machine that provides gripping surfaces that can be rapidly changed without changing the interfacing between the jaw and shaft of the assembly, or the base of the assembly and table. In that light, Engibarov is completely silent with regard to the structure and arrangement of the base plate, guide member comprising at least two guides, and the cassette as presently claimed.

Accordingly, Applicants respectfully submit that a person of ordinary skill in the art would not have found any of the instant claims to be obvious in view of the reference, for the structure and arrangement of the claimed invention and the reference are distinguishable, and there are no teachings, or suggestions that could be gleaned from the

reference that would have made any of the instant claims obvious to an artisan at the time of invention.

For at least the above reasons, reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claim 3 stands rejected under 35 U.S.C. §103(a) over the combination of Engibarov (U.S. 5,060, 920) as applied to claims 1-2, 4, and 7-9 above, and in further view of McConkey (U.S. 5,074,536). Applicants respectfully traverse this ground of rejection

Applicants stand on at least the patentability of claim 1, for the reasons previously discussed, and the fact that claim 3 is patentable at least because of its dependency on claim 1. The combination of Engibarov and McConkey fails even to disclose or suggest all the elements recited in the base claim. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claim 5 stands rejected under 35 U.S.C. §103(a) as applied to claims 1-2, 4, and 7-9 above, and further in view of Gaither.

Applicants stand on at least the patentability of claim 1, for the reasons previously discussed, and the fact that claim 5 is patentable at least because of its dependency on claim 1. The combination of Engibarov and Gaither fails even to disclose or suggest all the elements recited in the base claim. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claim 6 stands rejected under 35 U.S.C. §103(a) over Engibarov as applied to claims 1-2, 4, 7-9 above, and further in view of Takisawa et al. (U.S. 6,383,890, hereinafter "Takisawa"). Applicants respectfully traverse this ground of rejection.

Applicants respectfully stand on at least the patentability of claim 1, for the reasons previously discussed, and the fact that claim 6 is patentable at least because of its dependency on claim 1. The combination of Engibarov and Takisawa fails even to disclose or suggest all the elements recited in the base claim. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Finally, in closing, Applicants respectfully submit that with regard to rejections under 35 U.S.C. §103(a), the MPEP refers to the case of *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ 2d, 1780, 1783-84 (Fed. Cir. 1992), wherein the Court of Appeals for the Federal Circuit held the following regarding obviousness type rejections:

The mere fact that the prior art may be modified in the same manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification.


Accordingly, it is respectfully submitted that all grounds of rejection under 35 U.S.C. §103(a) have been overcome as the prior art fails to disclose or suggest the desirability of the modification. Reconsideration and withdrawal of all grounds of rejection are respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

Peter Zawilski
Registration No. 43,305

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By: 
Steve Cha
Attorney for Applicant
Registration No. 44,069

Mail all correspondence to:
Peter Zawilski, Registration No. 43,305
US PHILIPS CORPORATION
1109 McKay Drive MS SJ41,
San Jose, CA 95131
Telephone: (408) 474-9077
Fax: (408) 474-9082

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Steve Cha, Reg. No. 44,069
(Name of Registered Rep.)


(Signature and Date)